

**United States Bankruptcy Court
Central District of California**

In re Jinnie Jinhuei Chang Chao

Debtor(s)

Case No. 15-31519

Chapter 11

**COVER SHEET FOR APPLICATION FOR PROFESSIONAL COMPENSATION
(IN CASES UNDER CHAPTERS 7, 11 AND 12)**

Name of Applicant: Onyinye N Anyama

Authorized to Provide Professional Services to: Jinnie Jinhuei Chang Chao

Date of Order Authorizing Employment: January 10, 2016

Period for Which Compensation is Sought:

From: February 21, 2018 Through: October 24, 2023

Amount of Fees Sought: \$ 39,860.00

Amount of Expense Reimbursement Sought: \$ 214.29

This is an: Interim Application X Final Application _____

If this is *not* the first application filed herein by this professional, disclose as to all prior fee applications:

<u>Date Filed</u>	<u>Period Covered</u>	<u>Total Requested (Fees & Expenses)</u>	<u>Total Allowed (Fees and Expenses)</u>	<u>Fees & Expenses Previously Paid</u>
3/15/2017	12/7/15-3/14/17	\$22,360.00	\$18,000.02	\$10,000.00
2/21/2018	3/16/17-2/20/18	\$8,058.38	\$8,058.38	\$16,058.40

Date: November 1, 2023

By: /s/Onyinye N. Anyama

Onyinye N Anyama
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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In Re:)	Case No. 15-31519-DM
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)	
)	Chapter 11
JINNIE JINHUEI CHANG CHAO)	
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Debtor)	
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**THIRD INTERIM APPLICATION FOR COMPENSATION FOR LEGAL SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ANYAMA LAW
FIRM FOR DEBTOR IN POSSESSION**

Comes now Anyama Law Firm attorney for the Debtor in possession and respectfully submits the herein application for compensation under. Rule 2002 of the Bankruptcy Rules and B.L.R. 9029-1.

NOTICE OF APPLICATION

Notice of this Application is being sent concurrently with its filing to the Debtor, the Office of the United States Trustee, and all other parties required by the Court by ECF or by mail if a party is not registered. Applicant respectfully submits that no further notice is required in this matter.

1 The Debtor has also been provided a copy of this Application and an opportunity to review the
2 Application pursuant to the UST Guidelines. A true and correct copy of the cover letter sent concurrently
3 with the Application to the Debtor is attached to the Anyama Declaration as **Exhibit "D"**, in accordance
4 with the UST Guidelines.

5 **INTRODUCTION**

6 1. The within case was commenced by filing a voluntary Chapter 11 petition on December
7 4, 2016. A trustee has not been appointed and the Debtor is in possession of the estate.

8 2. **Employment:** The court authorized the Debtor's employment of Applicant on January 10,
9 2016. [See court Docket# 34].

10 3. **Prior Compensations:** On April 7, 2017 Applicant filed its "First" interim fee application
11 [See Court Docket #106]. In its first interim fee application, applicant sought court approval for interim
12 fees \$21,280.00, and reimbursement of costs incurred by Applicant during the Application Period in the
13 amount of \$1,080.02 for a total award of \$22,360.02. Applicant further requested that upon granting this
14 application, it be permitted to apply the sum of \$10,000.00; (Pre petition retainer in Attorney client trust
15 account). At the hearing held on May 5, 2017 the court approved the application for compensation .in
16 part and the balance of the fees was deferred. The court ordered that Applicant was allowed to withdraw
17 the balance of the retainer in the Attorney-Client Trust Account in the amount of \$10,000. The court
18 deferred any decision granting or denying the application for the balance of fees requested. [See Court
19 Docket #143].

20 On February 21, 2018 the applicant filed the "Second" interim Fee application See docket No.
21 191]. The Second application sought interim compensation for the period from March 16, 2017 through
22 February 20, 2018, which application was approved in the amount of \$7,390.00 in fees and \$668.38 in
23 unreimbursed expenses by order dated May 16, 2018 [See Court docket No. 219].

24 On May 16, 2018 the Court issued an order regarding the deferred balance of First application stating as
25 follows:

26 "Applicant is allowed, on an interim basis, fees in the amount of \$16,920.00
27 and costs in the amount of \$1,080.02. After application of the sum of the
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1 \$10,000.00 retainer, Applicant is entitled to payment of \$6,920.00 in fees and
2 \$1,080.02 in costs. The balance of the fees sought in the First application
3 \$4,360.00) is disallowed.”

4 Applicant has been paid \$26,058.40 on the previous approved applications. This application seeks
5 allowance of fees for services above and beyond those fees already approved (“additional fees”).

6 4. **Current Compensation:** This application covers professional services rendered from
7 February 21, 2018 through October 24, 2023 and expenses. Applicant rendered services with an additional
8 value of \$39,860.00. Applicant determined this figure more fully set forth in the detailed time records filed
9 with this application.

10 5. **Expenses:** During the same time period, Applicant also incurred expenses of \$214.29 as
11 detailed time records filed with this application. The total of the aforesaid fees and expenses is \$40,074.29.

12 6. **Compliance with guidelines:** As a general rule, Applicant's billing practices and hourly
13 rates are identical for bankruptcy and non-bankruptcy clients. The costs charged to bankruptcy estates are
14 either identical to or less than the costs charged to non-bankruptcy clients. This application is in compliance
15 with this Court's Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees
16 ("Guidelines for Professionals"). Applicant does not include word processing costs in its expenses and does
17 not mark-up its expenses.

18 7. **Status of the Case:** The Debtor has filed all schedules and statements of financial affairs
19 and is in full compliance with all reporting and administrative requirements established by the OUST. The
20 Debtor has also filed all Monthly Operating Report.

21 Applicant prepared and filed debtor's proposed combined Plan of reorganization and Disclosure
22 statement and filed on July 21, 2023. The hearing was set and be held on September 28, 2023. At the
23 hearing, the court approved the Disclosure statement with some requests modifications and confirmation
24 hearing is set for October 27, 2023.

25 8. **2016(b) Statement:** Applicant has not agreed to share any compensation to be awarded herein with
26 any other person. Applicant has neither received nor been promised other compensation for its services as
27 counsel for the Debtor herein, other than as may be awarded by the Court herein.
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1 **SUMMARY OF APPLICATION**

2 Pursuant to Bankruptcy Code §§327, 328, 330 and 331, Bankruptcy Rule 2016(a), L.R.7-216, and the
3 court's Guidelines for Professionals, Applicant requests that this court allow the following \$39,860.00 as
4 compensation and \$214.29 as reimbursement of expenses.

5 **REQUIRED DISCLOSURE**

6 Applicant has not agreed to fix the fees or other compensation to be paid for services rendered and
7 expenses incurred in connection with this case. Applicant has not agreed to share the compensation to be
8 received for the services rendered in this case. The hourly rate charged by Applicant is at or below the
9 customary rates charged by other comparably skilled practitioners in business and Chapter 11 bankruptcy
10 cases. Applicant's rate in this case is not greater than her standard rate charged to comparable clients for
11 comparable services in other bankruptcy cases and matters.

12 As set forth below, Applicant has compiled a project-based itemization of services rendered based on
13 contemporaneous daily records during the period covered by this Application. Applicant utilized some of
14 the project categories suggested by the UST Guidelines, which also permits case-specific categories. The
15 following chart summarizes project billing categories and the total hours expended for each category
16 during the period covered by this Application, and is followed by a narrative and detail

Category	Total Hours	Total Fees
1. Case Administration	74.1	\$29,340.00
2. Fee/ Employment Applications	6.3	\$2,520.00
3. Court Appearance	4.8	\$1,920.00
4. Motions	3.5	\$1,400.00
5. Disclosure Statement/Plan	11.7	\$4,680.00

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SUMMARY OF SERVICES

The services rendered by Applicant are set forth in detail in Exhibit "A" attached hereto, and they are summarized as follows:

1. COMMENCEMENT OF CASE

Applicant was retained as general insolvency counsel to the Debtor to assist her on behalf of her estate in this case in her role as debtor-in-possession. This case was commenced by the filing of a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on December 4, 2016 (the "Petition Date"). Ms. Chao intends to continue in the possession of her properties as debtor-in-possession pursuant to Sections 1107 and 1108 of the bankruptcy code.

Ms. Chao is an individual domiciled and with her primary residence within the San Francisco County State of California. Ms. Chao is a self-employed real estate broker and also receives income from her rental properties. Ms. Chao is engaged in the business of sale of real properties. The major assets of Ms. Chao are five real properties owned by Ms. Chao.

The event leading to bankruptcy was due to the economic downturn in 2008 and the near collapse of the real estate industry. Ms. Chao (real estate professional) experienced major decrease in her income. She attempted to reorganize her debt by filing Chapter 13 cases in 2015 pro se. However, the case was dismissed since Ms. Chao represented herself and was unsophisticated in bankruptcy matters. Ms. Chao employed the applicant to file her Chapter 11 bankruptcy to reorganize her debt.

Virtually all of the Debtor's assets are encumbered by holders of prior secured claims. The principal assets of the estate are the following properties currently owned by the debtor.

8108 Penobscot Ln. McKinney TX	305 St Andrews Dr. Pinehurst NC
701 Braxton Ct. McKinney TX	9 Maverick PL Pinehurs
30 Pilarcitos Ct Hillsborough CA	

On January 10, 2016, this Court entered an order appointing Anyarna Law Firm as Debtor's General Insolvency and Bankruptcy Counsel.

1 Among other things, Applicant assisted the Debtor in preparing and filing the voluntary chapter 11
2 petition and in preparing and filing the schedules, statement of financial affairs and other initial documents.
3 Applicant analyzed the background and financial affairs of the Debtor (including assets, expenses, liens,
4 in addition to mortgage statements, financial statements, rent rolls and other information). The Debtor
5 maintains most of this information in numerous documents, which presented an unusual challenge to
6 Applicant that required special attention.

7 Applicant further assisted the Debtor by preparing real property questionnaires and the Initial
8 Debtor Interview materials provided to the office of the United States Trustee. Applicant appeared at the
9 Initial Debtor Interview and the Section 341(a) Meeting of Creditors, and Applicant also advised the Debtor
10 in opening debtor-in-possession bank accounts.

11 Applicant assisted the Debtor in successfully preparing a motion for authority to use the cash
12 collateral of secured creditors generated by debtor's rented real properties. Considerable time was spent in
13 collecting required information (rent rolls, proof of rent received, proof of expenses, and other
14 information), calculating rental income and expenses, generating budgets for the Rental Properties and
15 advising the Debtor on the appropriate use of cash collateral.

16 **2. CASE ADMINISTRATION**

17 The Firm assisted the Debtor with substantially all aspects of the administration of the within case,
18 including by advising the Debtor with respect to her duties as debtor-in-possession and by reviewing and
19 filing monthly operating reports. The firm analyzed the financial affairs and documents of the Debtor,
20 developed case strategies, addressed issues regarding debtor-in-possession accounts, coordinated with
21 other professionals, and reviewed and analyzed questions regarding proofs of claims.

22 The preparation and submission of the operating reports, along with the preparation, filing and
23 appearances at Status conferences are part of this category.

24 In connection with this category, Applicant earned \$29,340.00 in attorney's fees, as detailed in attached
25 Exhibit "A".

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1 **3. MOTIONS/CLAIM OBJECTIONS**

2 On June 28, 2023 the U.S. Trustee filed a Motion to Dismiss or Convert the instant case. Applicant
3 reviewed the Motion. Applicant prepared and reviewed debtor's opposition to the said motion and prepare
4 for and attend the hearings on this motion and the hearing is set and will be held on October 27, 2023.

5 In connection with this category, Applicant earned \$1,400.00 in attorney's fees, as detailed in
6 attached Exhibit "A".

7 **4. EMPLOYMENT OF PROFESSIONALS/ FEE APPLICATIONS**

8 During the period covered by this application the applicant prepared her fee applications, including
9 by reviewing its billing records, the docket of the within case, the firm's file and other documents, among
10 other things. The preparation of this fee application required the firm to analyze billing and expense records
11 and to properly categorize time.

12 Applicant prepared applications to employ Ethan A. Balogh and Bernard J. Kornberg as Special
13 counsels to represent the Debtor in the active Adversary Case (two separated applications to employ) but
14 on August 16, 2023 the Debtor and proposed Special Counsel Ethan A. Balogh decided to surrender his
15 application to employ and applicant prepare and file the corresponding motion to withdrawal his
16 application to employ. The court entered the order employing Bernard J. Kornberg on August 18, 2023.

17 In connection with this category, Applicant earned \$2,520.00 in attorney's fees, as detailed in
18 attached Exhibit "A".

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20 **5. PLAN AND DISCLOSURE STATEMENT**

21 Counsel reviewed and prepared debtor's combined plan and disclosure statement. On July 21, 2023
22 Applicant prepared and filed debtor's proposed combined Plan of reorganization and Disclosure statement.
23 At the hearing, the court approved the Disclosure statement and confirming the plan. The confirmation
24 hearing is set for and held on October 27, 2023.

25 In connection with this category, Applicant earned \$4,680.00 in attorney's fees, as detailed in
26 attached Exhibit "A".
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6. COURT APPEARANCE

Applicant prepared for and appeared at several hearings on behalf of the debtor, including, status conference, Motion to sell real estate, disclosure statement and Plan hearings. In connection with this category, Applicant earned \$1,920.00 in attorney's fees as detailed in attached Exhibit "A".

BREAKDOWN OF EXPENSES INCURRED

From March 21, 2018, through October 24, 2023, Applicant incurred the following expenses:

Expense	Total Cost
Photocopies costs	\$97.50
Postages costs	\$116.79
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	\$214.29

In accordance with this Court's Guidelines for Professionals, Applicant's policy is to charge Clients \$.10 per page for internal photocopying and actual costs associated with postage, court fees and research.

ESTABLISHMENT OF FEES

A compensation award based on a reasonable hourly rate multiplied by the number of hours actually and reasonably expended is presumptively a reasonable fee. *In re Manoa Finance Company*, 853 F.2d 687, 689 (9th Cir. 1988). Establishing a reasonable hourly rate requires consideration of market rates in the relevant community which are, in turn, at least partly function of the type of services rendered and the lawyer's experience, skill, and reputation.

PRAYER FOR RELIEF

WHEREFORE, Applicant prays for entry of an order:

1. Approving and allowing compensation in the amount of \$39,860.00

- 1 2. Approving and allowing reimbursement of expenses in the amount of \$214.29, for a total of
2 \$40,074.29 in this third fee application.
3 3. For such other and further relief as the court deems appropriate.
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5 Dated: October 27, 2023

ANYAMA LAW FIRM, A.P.C

7 By: /s/Onyinye N. Anyama

8 Onyinye N. Anyama
9 Attorney for Debtor
Jinnie Jinhuei Chang Chao
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CERTIFICATION

I Onyinye Anyama, counsel of record for the Debtor certify that I have read the application herein and to the best of my knowledge, information and belief, formed after responsible inquiry, the compensation and expense reimbursement sought is in conformity with the Guidelines for Compensation and Expense Reimbursement of Professionals promulgated by this court and the compensation and expense reimbursement request are billed at rates accordance with practices no less favorable than those customarily employed by the applicant and generally accepted by the applicant's debtor-in-possession clients.

Dated: October 27, 2023

ANYAMA LAW FIRM, A.P.C

By: /s/Onyinye N. Anyama

Onyinye N. Anyama
Attorney for Debtor
Jinnie Jinhuei Chang Chao

EXHIBIT "A"

**Anyama Law Firm,
A Professional Corporation**
18000 Studebaker Road #325, Cerritos, CA 90703
Tel: (562) 645-4500
Email: onyi@anyamalaw.com

To: Jinnie Jinhuei Chang Chao

SERVICES

CASE ADMINISTRATION

Date	Activity	Description	Quantity	Price	Total
2/21/2018	Case Administration	Prepare and file Notice of Hearing re Disclosure Statement	0.3	\$400.00	\$120.00
2/21/2018	Case Administration	Final review and file Operating Report for period ending 1/31/2018	0.3	\$400.00	\$120.00
3/20/2018	Case Administration	Operating Report for 2/28/2018	0.3	\$400.00	\$120.00
4/19/2018	Case Administration	Operating report for 3/31/2018	0.3	\$400.00	\$120.00
4/23/2018	Case Administration	Review Transfer of Claim on Proof of Claim #6 of Pennymac	0.5	\$400.00	\$200.00
5/24/2018	Case Administration	Operating Report of 4/30/2018	0.5	\$400.00	\$200.00
6/20/2018	Case Administration	Operating report for 5/31/2018	0.5	\$400.00	\$200.00
8/2/2018	Case Administration	Operating report for 6/30/2018	0.5	\$400.00	\$200.00
8/14/2018	Case Administration	Operating report for 7/31/2018	0.5	\$400.00	\$200.00
8/16/2018	Case Administration	Status Conference Statement	0.5	\$400.00	\$200.00
9/12/2018	Case Administration	Prepare and file Notice of Change of address for Debtor	0.2	\$400.00	\$80.00
9/14/2018	Case Administration	Operating report for 8/31/2018	0.5	\$400.00	\$200.00
10/17/2018	Case Administration	Operating report of 9/30/2018	0.5	\$400.00	\$200.00
11/27/2018	Case Administration	Operating report of 10/31/2018	0.5	\$400.00	\$200.00
11/27/2018	Case Administration	Prepare file and service of Updated Status Conference Statement	1	\$400.00	\$400.00
12/12/2018	Case Administration	Prepared Operating Report for the month of November 2018	0.5	\$150.00	\$75.00
12/12/2018	Case Administration	Operating report of 11/30/2018	0.5	\$400.00	\$200.00
12/17/2018	Case Administration	Telephone Conference with debtor and counsel on criminal case regarding adversary case	0.5	\$400.00	\$200.00
1/8/2019	Case Administration	Review Court's tentative ruling re Status Conference	0.8	\$400.00	\$320.00
1/22/2019	Case Administration	Operating report of 12/31/2018	0.5	\$400.00	\$200.00
2/12/2019	Case Administration	Preparation of the Monthly Operating Report for January 2019.	0.7	\$150.00	\$105.00
2/12/2019	Case Administration	Operating report of 1/31/2019	0.5	\$400.00	\$200.00
2/12/2019	Case Administration	Operating Report of 01/31/2019	0.5	\$400.00	\$200.00
3/15/2019	Case Administration	Preparation and filing of the monthly operating report for February 2019.	0.5	\$400.00	\$200.00
3/19/2019	Case Administration	Operating report of 2/28/2019	0.5	\$400.00	\$200.00

4/11/2019	Case Administration	Prepare file and service of 2nd Status Conference Statement	1	\$400.00	\$400.00
4/19/2019	Case Administration	Review and calendar continued Status Conference hearing set by Court	0.5	\$400.00	\$200.00
4/26/2019	Case Administration	Operating report of 3/31/2019	0.5	\$400.00	\$200.00
5/31/2019	Case Administration	Operating report of 4/30/2019	0.5	\$400.00	\$200.00
6/17/2019	Case Administration	Operating report for 5/31/2019	0.5	\$400.00	\$200.00
6/20/2019	Case Administration	Prepare file and service of Updated status conference statement	1	\$400.00	\$400.00
6/26/2019	Case Administration	Communication with creditor's Counsel re Continuation of status conference hearing	0.3	\$400.00	\$120.00
8/16/2019	Case Administration	Operating report of 6/30/2019	0.5	\$400.00	\$200.00
8/20/2019	Case Administration	Operating Report of 7/31/2019	0.5	\$400.00	\$200.00
8/26/2019	Case Administration	Review Motion for Relief from Automatic Stay of Wilmington Trust	1	\$400.00	\$400.00
9/9/2019	Case Administration	Prepare file and service of Updated Status Conference Statement	1	\$400.00	\$400.00
9/11/2019	Case Administration	Review and sign Stipulation with creditor Wilmington Trust re MRS	0.3	\$400.00	\$120.00
9/12/2019	Case Administration	Communications with Creditor Wilmington Trust re APO Agreement between parties regarding MRS	1	\$400.00	\$400.00
9/12/2019	Case Administration	Prepare and attend hearing re Motion for Relief From Stay filed by Wilmington Trust	1	\$400.00	\$400.00
11/18/2019	Case Administration	Operating report of 8/31/2019	0.5	\$400.00	\$200.00
11/18/2019	Case Administration	Operating report of 9/30/2019	0.5	\$400.00	\$200.00
11/18/2019	Case Administration	Operating report of 10/31/2019	0.5	\$400.00	\$200.00
12/11/2019	Case Administration	Prepare file and service of Updated Status Conference report.	0.8	\$400.00	\$320.00
1/31/2020	Case Administration	Operating report of 11/30/2019	0.5	\$400.00	\$200.00
1/31/2020	Case Administration	Operating report of 12/31/2019	0.5	\$400.00	\$200.00
3/16/2020	Case Administration	Prepare and file Supplemental Status conference statement	0.8	\$400.00	\$320.00
3/31/2020	Case Administration	Operating report of 1/31/2020	0.5	\$400.00	\$200.00
3/31/2020	Case Administration	Operating report of 2/29/2020	0.5	\$400.00	\$200.00
5/20/2020	Case Administration	Operating report of 3/31/2020	0.5	\$400.00	\$200.00
5/22/2020	Case Administration	Operating report of 4/30/2020	0.5	\$400.00	\$200.00
6/17/2020	Case Administration	Review and calendar Order Changing time of hearing re Status Conference	0.2	\$400.00	\$80.00
6/25/2020	Case Administration	Operating report of 5/31/2020	0.5	\$400.00	\$200.00
6/25/2020	Case Administration	Prepare and telephonically attend Status Conference Hearing	1	\$400.00	\$400.00
7/29/2020	Case Administration	Operating report of 6/30/2020	0.5	\$400.00	\$200.00
8/28/2020	Case Administration	Operating report of 7/31/2020	0.5	\$400.00	\$200.00
9/25/2020	Case Administration	Operating report of 8/31/2020	0.5	\$400.00	\$200.00
10/23/2020	Case Administration	Operating report of 9/30/2020	0.5	\$400.00	\$200.00
12/23/2020	Case Administration	Operating Report of 10/31/2020	0.5	\$400.00	\$200.00
12/23/2020	Case Administration	Operating report of 11/30/2020	0.5	\$400.00	\$200.00
1/21/2021	Case Administration	Operating report of 12/31/2020	0.5	\$400.00	\$200.00
2/19/2021	Case Administration	Operating report of 1/31/2021	0.5	\$400.00	\$200.00
2/19/2021	Case Administration	Updated Status Conference Statement	1	\$400.00	\$400.00

2/23/2021	Case Administration	Review and calendar Continued date for Status Conference hearing	0.5	\$400.00	\$200.00
5/21/2021	Case Administration	Operating report of 2/28/2021	0.5	\$400.00	\$200.00
5/24/2021	Case Administration	Operating report of 3/31/2021	0.5	\$400.00	\$200.00
5/24/2021	Case Administration	Operating report of 4/30/2021	0.5	\$400.00	\$200.00
6/5/2021	Case Administration	Communication with Secured Creditor (Wilmington) re NON-Cure of Default as APO	0.2	\$400.00	\$80.00
6/20/2021	Case Administration	Various Calls with Debtor re Wilmington Notice of Delinquency payments	1	\$400.00	\$400.00
6/22/2021	Case Administration	Review Creditor Wilmington Trust's filed Declaration of Non Cure of Default re APO signed	0.3	\$400.00	\$120.00
6/23/2021	Case Administration	Prepare and file Objection to Creditor (Wilmington) filed Declaration of NON cure of Default	1	\$400.00	\$400.00
6/25/2021	Case Administration	Review Order denying Creditor request for Default re MRS	0.2	\$400.00	\$80.00
6/30/2021	Case Administration	Review Court information re APO with Wilmington re Debtor's form of payments	0.5	\$400.00	\$200.00
7/21/2021	Case Administration	Operating report of 5/31/2021	0.5	\$400.00	\$200.00
7/21/2021	Case Administration	Operating report of 6/30/2021	0.5	\$400.00	\$200.00
8/25/2021	Case Administration	Operating report of 7/31/2021	0.5	\$400.00	\$200.00
9/27/2021	Case Administration	Operating report of 8/31/2021	0.5	\$400.00	\$200.00
10/18/2021	Case Administration	Operating report of 9/30/2021	0.5	\$400.00	\$200.00
10/27/2021	Case Administration	Prepare file and service of Updated Status Conference Statement	1	\$400.00	\$400.00
10/29/2021	Case Administration	Prepare and attend Status conference hearing	1.5	\$400.00	\$600.00
10/29/2021	Case Administration	Prepare and attend Status conference hearing	1.5	\$400.00	\$600.00
11/22/2021	Case Administration	Operating report of 10/31/2021	0.5	\$400.00	\$200.00
12/17/2021	Case Administration	Operating Report of 11/30/2021	0.5	\$400.00	\$200.00
1/7/2022	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
1/21/2022	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
1/24/2022	Case Administration	Operating Report of 12/31/2021	0.5	\$400.00	\$200.00
1/24/2022	Case Administration	Review Court's tentative ruling continuing Status Conference	0.2	\$400.00	\$80.00
1/24/2022	Case Administration	Prepare and file Amended Operating report of 11/30/2021	0.5	\$400.00	\$200.00
2/22/2022	Case Administration	Operating Report of 1/31/2022	0.5	\$400.00	\$200.00
3/21/2022	Case Administration	Operating Report of 2/28/2022	0.5	\$400.00	\$200.00
4/8/2022	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
4/21/2022	Case Administration	Operating Report of 3/31/2022	0.5	\$400.00	\$200.00
6/23/2022	Case Administration	Operating Report of 4/30/2022	0.5	\$400.00	\$200.00
6/23/2022	Case Administration	Operating Report of 4/30/2022	0.5	\$400.00	\$200.00
6/23/2022	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
6/23/2022	Case Administration	Operating Report of 5/31/2022	0.5	\$400.00	\$200.00
7/25/2022	Case Administration	Operating Report of 6/30/2022	0.5	\$400.00	\$200.00

8/29/2022	Case Administration	Operating Report of 7/31/2022	0.5	\$400.00	\$200.00
9/28/2022	Case Administration	Operating Report of 8/31/2022	0.5	\$400.00	\$200.00
10/19/2022	Case Administration	Operating Report of 9/30/2022	0.5	\$400.00	\$200.00
11/30/2022	Case Administration	Operating Report of 10/31/2022	0.5	\$400.00	\$200.00
12/23/2022	Case Administration	Operating Report of 11/30/2022	0.5	\$400.00	\$200.00
1/13/2023	Case Administration	Prepare for and attend Status conference hearing	1	\$400.00	\$400.00
1/24/2023	Case Administration	Operating Report of 12/31/2022	0.5	\$400.00	\$200.00
1/30/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
2/17/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
2/19/2023	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
2/21/2023	Case Administration	Operating Report of 1/31/2023	0.5	\$400.00	\$200.00
2/24/2023	Case Administration	Prepare for and attend Status conference hearing	1	\$400.00	\$400.00
2/24/2023	Case Administration	Telephone communication with debtor regarding case	0.3	\$400.00	\$120.00
2/24/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
3/2/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
3/30/2023	Case Administration	Operating Report of 2/28/2023	0.5	\$400.00	\$200.00
4/7/2023	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
4/21/2023	Case Administration	Operating Report of 3/31/2023	0.5	\$400.00	\$200.00
4/21/2023	Case Administration	Prepare for and attend Status conference hearing	1	\$400.00	\$400.00
4/26/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
5/18/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
5/22/2023	Case Administration	Operating Report of 4/30/2023	0.5	\$400.00	\$200.00
6/2/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
6/2/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
6/23/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
6/23/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
6/25/2023	Case Administration	Prepare file and service of Updated status conference report	1	\$400.00	\$400.00
6/28/2023	Case Administration	Review Trustee's Motion to Dismiss	0.5	\$400.00	\$200.00
7/10/2023	Case Administration	Telephone communication with debtor regarding case	0.3	\$400.00	\$120.00
7/10/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
7/10/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00

7/14/2023	Case Administration	Telephone communication with debtor regarding case	0.5	\$400.00	\$200.00
7/20/2023	Case Administration	Operating Report of 5/31/2023	0.5	\$400.00	\$200.00
7/20/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
7/27/2023	Case Administration	Operating Report of 6/30/2023	0.5	\$400.00	\$200.00
7/28/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
7/28/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
7/28/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
8/13/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
8/21/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
8/21/2023	Case Administration	Telephone communication with debtor regarding case	0.2	\$400.00	\$80.00
8/22/2023	Case Administration	Operating Report of 7/31/2023	0.5	\$400.00	\$200.00
8/28/2023	Case Administration	Telephone communication with debtor regarding case	0.3	\$400.00	\$120.00
8/28/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
8/28/2023	Case Administration	Telephone communication with debtor regarding case	0.1	\$400.00	\$40.00
8/29/2023	Case Administration	Telephone communication with debtor regarding case	0.4	\$400.00	\$160.00
TOTAL CASE ADMINISTRATION			<u>74.1</u>		<u>\$29,340.00</u>

MOTIONS

Date	Activity	Description	Quantity	Price	Total
7/14/2023	Motions	Prepare file and service of Brief/Memorandum in Opposition to Trustee's Motion to dismiss	1.5	\$400.00	\$600.00
7/28/2023	Motions	Prepare for and Attend hearing re Trustee's Motion to Dismiss	1	\$400.00	\$400.00
8/18/2023	Motions	Prepare for and attend Hearing re Trustee's Motion to Dismiss	1	\$400.00	\$400.00
TOTAL MOTIONS			<u>3.5</u>		<u>\$1,400.00</u>

FEE / EMPLOYMENT APPLICATIONS

Date	Activity	Description	Quantity	Price	Total
7/21/2023	Fee/Employment App	Prepare file and service for Application to Employ Bernard J. Kornberg as Special Counsel	1	\$400.00	\$400.00
7/21/2023	Fee/Employment App	Prepare file and service for Application to Employ Ethan A. Balogh as Special Counsel	1	\$400.00	\$400.00
8/11/2023	Fee/Employment App	Prepare for and attend Hearing re Special Counsels Employment applications	1	\$400.00	\$400.00
8/16/2023	Fee/Employment App	Prepare and file Withdrawal of application to employ Ethan A. Balogh as Special Counsel	0.5	\$400.00	\$200.00
8/18/2023	Fee/Employment App	Review Order approving employment of Bernard J. Kornberg as Special Counsel	0.2	\$400.00	\$80.00
10/24/2023	Fee/Employment App	Prepared and reviewed 3rd fee application	2.6	\$400.00	\$1,040.00
			<u>6.3</u>		<u>\$2,520.00</u>

DISCLOSURE STATEMENT / PLAN

Date	Activity	Description	Quantity	Price	Total
2/21/2018	Disclosure statement/Plan	Prepare Attorney and Debtor's Declarations supporting Disclosure Statement	0.6	\$400.00	\$240.00
2/21/2018	Disclosure statement/Plan	Notice of hearing for amended Disclosure Statement	0.1	\$400.00	\$40.00
3/1/2018	Disclosure statement/Plan	Review Limited Objection of Wilmington Trust re Pilarcitos property.	0.5	\$400.00	\$200.00
3/1/2018	Disclosure statement/Plan	Review limited objection to Debtors Combined Plan and Disclosure Statement	0.5	\$400.00	\$200.00
3/8/2018	Disclosure statement/Plan	Hearing held and continued re: A revised Plan and Disclosure Statement	1	\$400.00	\$400.00
3/14/2018	Disclosure statement/Plan	Amend Disclosure Statement and Chapter 11 Plan	0.7	\$400.00	\$280.00
3/16/2018	Disclosure statement/Plan	Hearing Held. A revised Plan and Disclosure Statement. Tentatively approving the Disclosure Statement	1	\$400.00	\$400.00
4/10/2018	Disclosure statement/Plan	Preparation and service of Chapter 11 Plan Order Approving Disclosure Statement and Ballots	1	\$400.00	\$400.00
4/23/2018	Disclosure statement/Plan	Prepare and file Ballot Summary	0.8	\$400.00	\$320.00
4/23/2018	Disclosure statement/Plan	Service of filed Summary of Ballots	0.2	\$400.00	\$80.00
8/23/2018	Disclosure statement/Plan	Prepare and Attend hearing of Final Approval of Disclosure Statement and Confirmation	1.5	\$400.00	\$600.00
7/21/2023	Disclosure statement/Plan	Prepare file and service of Combined Plan of Reorganization and Disclosure Statement	2	\$400.00	\$800.00
7/28/2023	Disclosure statement/Plan	Prepare file and service for Notice of hearing re Debtor's Combined Plan of Reorganization and Disclosure Statement	0.5	\$400.00	\$200.00

8/10/2023	Disclosure statement/Plan	Review Objection to Confirmation of Debtor's Chapter 11 Plan	0.5	\$400.00	\$200.00
8/17/2023	Disclosure statement/Plan	Prepare file and service of Reply to Objection to confirm Debtor's Chapter 11 Plan	0.8	\$400.00	\$320.00
TOTAL DISCLOSURE STATEMENT / PLAN			<u>11.7</u>		<u>\$4,680.00</u>

COURT APPEARANCE

Date	Activity	Description	Quantity	Price	Total
10/29/2021	Court Appearance	Prepare and attend Status Conference	1	\$400.00	\$400.00
6/24/2022	Court Appearance	Prepare for and attend hearing re status conference	0.5	\$400.00	\$200.00
1/13/2023	Court Appearance	Prepared for and attend hearing re status conference	0.5	\$400.00	\$200.00
2/24/2023	Court Appearance	Prepared for and attend hearing re status conference	0.5	\$400.00	\$200.00
4/21/2023	Court Appearance	Prepared for and attend hearing re status conference	0.5	\$400.00	\$200.00
7/28/2023	Court Appearance	Prepared for and attend hearing re status conference/Motion to dismiss	0.5	\$400.00	\$200.00
8/11/2023	Court Appearance	Prepared for and attend hearing re status conference/ employment application	0.5	\$400.00	\$200.00
8/14/2023	Court Appearance	Prepared for and attend hearing re status conference /Motion to dismiss	0.4	\$400.00	\$160.00
8/18/2023	Court Appearance	Prepared for and attend hearing re status conference /Motion to dismiss	0.4	\$400.00	\$160.00
TOTAL COURT APPEARANCE			<u>4.8</u>		<u>\$1,920.00</u>

CATEGORY	TOTAL HOURS	TOTAL FEES	
Case Administration	74.1	\$29,340.00	
Fee / Employment Application	6.3	\$2,520.00	
Motions	3.5	\$1,400.00	
Disclosure Statement / Plan	11.7	\$4,680.00	
Court Appearance	4.8	\$1,920.00	

Name	Total hours	Hourly rate	Total Fees
Onyinye N. Anyama	99.2	\$400.00	\$39,680.00
Elizabeth Cruz	1.2	\$150.00	\$180.00